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AZ CORP COMMISSION
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August 13, 2001

VIA FEDERAL EXPRESSArizona Corporation Commission
Utilities Division
1200 West Washington
Phoenix, Arizona 85007RE: *In the Matter of the Investigation Into US West Communication, Inc.'s
Compliance With the § 271 of the Telecommunications Act of 1996, Arizona
docket no. T-00000A-97-0238*

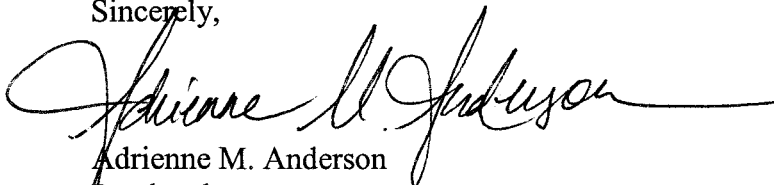
Dear Sir or Madam:

Enclosed for filing in the above referenced docket is *Covad Communications Company's Non-Confidential Objections and Responses to Arizona Corporation Commission Staff's Second Set of Data Requests*. The original and ten (10) copies of the aforementioned document will be and delivered to your office.

Covad considers several responses to these data requests as highly confidential information. We will provide such confidential information upon issuance of the Arizona Corporation Commission's Protective Order.

Please contact me at 720-208-3354 with any questions. Thank you.


Sincerely,


Adrienne M. Anderson
Paralegal

Enclosures

Arizona Corporation Commission
DOCKETED

AUG 15 2001

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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE INVESTIGATION
INTO U S WEST COMMUNICATIONS, INC.'S
COMPLIANCE WITH §271(C) OF THE
TELECOMMUNICATIONS ACT OF 1996

)
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) DOCKET NO. T-00000B-97-0238
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COVAD COMMUNICATION COMPANY'S NON-CONFIDENTIAL OBJECTIONS AND
RESPONSES TO ARIZONA CORPORATION COMMISSION STAFF'S
SECOND SET OF DATA REQUESTS

Covad Communications Company ("Covad") hereby submits its Non-confidential
Objections and Responses to the Arizona Corporation Commission Staff's Second Set of
Data Requests.

GENERAL OBJECTIONS TO ALL DATA REQUESTS

1. Covad objects to each and every Request to the extent they seek information subject to the attorney-client privilege, work product doctrine or any other privilege recognized by the State of Arizona. In responding to these Requests, Covad does not waive, but preserves, all such privileges.
2. Covad objects to each and every Request to the extent they seek information that is confidential, sensitive, competitive in nature or proprietary to it.
3. Covad objects to each and every Request to the extent that they are unreasonably burdensome, overly broad or not reasonably calculated to lead to the discovery of admissible evidence.
4. Covad objects to each and every one of Staff's definitions and/or instructions to the extent they purport to abrogate any of Covad's rights, or add to any of Covad's obligations under, the Arizona Rules of Civil Procedure or the Commission's Rules.
5. Covad objects to each and every Request to the extent they are overly broad, unduly burdensome and impose any burden not expressly permitted under the Commission's Rules or the Arizona Rules of Civil Procedure. Specifically, Covad is not required to extract information from documents, recite information contained in documents, or perform work or analysis that Staff can perform for itself. To the extent

that the burden of deriving or ascertaining the response to any Request is substantially the same for Covad and Staff, Staff may not shift such burden onto Covad.

6. Covad objects to each and every Request to the extent that they call for information already in the possession, custody and control of Staff.

7. Covad objects to each and every Request to the extent they seek information outside of Covad's possession, custody or control.

8. Covad expressly reserves the right to supplement or amend its objections and responses as necessary.

Covad incorporates the foregoing General Objections and Reservation of Right into each Request as if fully set forth therein.

Discovery Request No. 1.

Are you providing facilities-based local exchange service to residential customers within Qwest's service territory in the State of Arizona?

Response: No.

Discovery Request No. 2.

Please identify the number of residential access lines you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

Response: None.

Discovery Request No. 3.

Please identify the number of residential access lines you serve within Qwest's service territory in the State of Colorado via facilities owned by you.

Response: See Response to Data Request No. 2.

Discovery Request No. 4.

Please identify the number of residential access lines you serve via UNEs, UNE-P, and/or UNE Combinations within Qwest's service territory in the state of Arizona.

Response: HIGHLY CONFIDENTIAL INFORMATION.

Discovery Request No. 5.

Please identify the number of residential access lines you serve via resale within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 2.

Discovery Request No. 6.

Please identify the number of residential access lines you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 2.

Discovery Request No. 7.

Please identify the number of residential customer you serve within Qwest's service territory in the state of Arizona via facilities owned by you.

Response: See Response to Data Request No. 1.

Discovery Request No. 8.

Please identify the number of residential customers you serve via facilities-based competition within Qwest's service territory in the State of Colorado.

Response: See Response to Data Request No. 4.

Discovery Request No. 9.

Please identify the number of residential customers you serve via resale within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 2.

Discovery Request No. 10.

Are you providing facilities-based local exchange service to business customers within Qwest's service territory in the state of Arizona.

Response: No.

Discovery Request No. 11.

Please identify the number of business access lines you serve via facilities-based competition within Qwest's service territory in the State of Arizona.

Response: See Response to Data Request No. 1.

Discovery Request No. 12.

Please identify the number of business access lines you serve within Qwest's service territory in the State of Arizona via facilities owned by you.

Response: See Response to Data Request No. 2.

Discovery Request No. 13.

Please identify the number of business access lines you serve via UNEs, UNE-P, and/or UNE Combinations within Qwest's service territory in the State of Arizona.

Response: HIGHLY CONFIDENTIAL INFORMATION.

Discovery Request No. 14.

Please identify the number of business access lines you serve via resale within Qwest's service territory in the state of Arizona?

Response: See Response to Data Request No. 2.

Discovery Request No. 15.

Please identify the number of business customers you serve via facilities-based competition with Qwest's service territory in the state of Arizona.

Response: See Response to Data Request No. 2.

Discovery Request No. 16.

Please identify the number of business customers you serve within Qwest's service territory in the state of Colorado via facilities owned by you.

Response: See Response to Data Request No. 2.

Discovery Request No. 17.

Please identify the number of business customer you serve via UNEs, UNE-P, and/or UNE Combinations within Qwest's service territory in the state of Arizona.

Response: HIGHLY CONFIDENTIAL INFORMATION.

Discovery Request No. 18.

Please identify the number of business customers you serve via resale within Qwest's service territory in the state of Arizona.

Response: See Response to Data Request No. 1.

Dated this 13th day of August, 2001.

COVAD COMMUNICATIONS COMPANY

By:


K. Megan Doberneck

Senior Counsel

Covad Communications Company

7901 Lowry Boulevard

Denver, CO 82030

720-208-3636

720-208-3256 (facsimile)

e-mail: mdoberne@covad.com

CERTIFICATE OF SERVICE

I, Adrienne M. Anderson, hereby certify that the original and ten (10) copies of the foregoing NONCONFIDENTIAL Covad Communications Company's Objections and Responses to Arizona Corporation Commission Staff's Second Set of Data Requests in Docket No. T-00000B-97-0238, was filed via overnight delivery on this 13th day of August, 2001, addressed to the following:

Matthew Rowell
Chief of Economics & Research
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007


Caroline A. Butler
Paralegal
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

and a true and correct copy was served electronically, on this 13th day of August, 2001, addressed to the following:

Maureen Scott
Staff Attorney
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
MScott@cc.state.az.us

Phil Doherty
Consultant
Doherty & Company, Inc.
rhip@bell-atlantic.net

And a true and correct copy was served electronically on this 13th day of August, 2001, to each person on the e-mail distribution list for this docket provided by Staff of the Arizona Corporation Commission.


Adrienne M. Anderson